

REMARKS

Claims 1, 8, 9, 10, 19, 27, 29, 35, 36, 39, 47, 48, 51, 56 and 61 are amended. Claims 1-76 remain in the application for consideration. In view of the following remarks, Applicant respectfully requests that the application be forwarded onto issuance.

The Claim Rejections

Claims 1-28, 39-50 and 56-71 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Application Publication No. 2001/0031066 to Meyer et al. (hereinafter “Meyer”).

Claims 29-36 and 51-55 stand rejected under 35 U.S.C. §103(a) as being obvious over U.S. Patent No. 6,553,379 to Jaeger.

Claims 72-76 stand rejected under 35 U.S.C. §103(a) as being obvious over U.S. Patent No. 6,345,256 to Milsted.

Preliminarily, Applicant would like the record to reflect that certain claims are being amended simply in an attempt to advance prosecution in this case. The amendments of the claims are in no way to be construed as an admission as to the propriety of the Office's rejections. Quite to the contrary, Applicant continues to disagree with the Office's position with regard to the references—particularly Meyer. As such, Applicant reserves its right to file additional continuation applications to pursue, through appeal if necessary, the subject matter that it believes it is due.

1 **The Claims Rejected Over Meyer**

2 **Claim 1** has been amended and, as amended, recites a method of
3 processing media content comprising [added language appears in bold italics]:

4

5 • receiving a physical ID that corresponds to a specific media upon
6 which content resides that can be experienced by a user;
7 • mapping the physical ID to a logical ID; and
8 • searching a database that contains metadata associated with the
9 specific media by using the logical ID as a basis for a search query,
*wherein different instances of a specific media with the same
content thereon are associated with different physical IDs that are
mappable to the same logical ID.*

10

11 In making out the rejection of this claim, the Office argues that its subject
12 matter is anticipated by Meyer. Specifically, the Office cites paragraph 18, lines 4-
13 8 of Meyer as disclosing a method of processing media content comprising
14 ***mapping the physical ID to a logical ID.*** For the reasons set forth below,
15 Applicant respectfully traverses the Office's rejections.

16 The present claim is directed to a method that receives a physical ID that
17 corresponds to a ***specific media*** upon which content resides, maps the physical ID
18 to a logical ID, and then searches for metadata associated with the ***specific media***.

19 As but one non-limiting example of subject matter from the Specification
20 that is within the spirit of this claim, consider the following text taken from the
21 Specification starting on page 11, line 11:

22 **Physical Media Identification and Unique Logical ID Mapping**

23 In one described embodiment, a physical ID or "PID" is associated
24 with each media upon which the content that is to be experienced by a user
25 resides. The PID is assigned or otherwise associated with a logical ID or
"LID", and the LID is then used as the basis for any database queries.

1 Consider, for example, Fig. 3. There, six CDs are shown—two each
2 of the Backstreet Boys “Black and Blue” CD, Britney Spears “Stronger”
3 CD and Weird Al’s “Running with Sissors” CD. ***Each of these CDs***
4 ***belongs to a different person.*** As shown, each CD has a physical ID
5 associated with it. ***Each physical ID is different.*** For example, there are
6 two different physical IDs associated with the Backstreet Boys CD (i.e.
“12345” and “34567”). ***Yet, each of these different physical IDs is mapped***
7 ***to the same logical ID*** (i.e. ABCDE). This logical ID is then used by the
8 system as the basis for any database queries for metadata associated with
9 the Backstreet Boys CD.

10 Meyer neither discloses nor suggests mapping the physical ID to a logical
11 ID as recited in this claim and described in the Specification. Paragraph 018,
12 which the Office argues discloses this subject matter, is reproduced below for the
convenience of the Office.

13 [0018] In some application scenarios, the embedding process
14 interacts with a registration process to get an identifier. The embedding
15 process provides information about the object (e.g., a title and artist name,
16 an ISRC, name of distributor, etc.). ***In response, the registration process***
17 ***provides an identifier and stores a database record of the association***
18 ***between identifier and the object or other information used in decoding to***
19 ***identify the object, such as its distributor or broadcaster.*** The registration
20 process may be used to assign an identifier to an audio object and to
21 distributors or broadcasters of audio objects. The embedding and
22 registration processes may occur before the audio object is distributed to
23 consumers, or sometime thereafter, such as when a user transfers (e.g.,
24 “rips”) a media object from one format to another (e.g., a packaged format
25 to an electronic file format such as a compressed file format).

26
27 The above paragraph, cited by the Office as disclosing the claimed subject
28 matter of mapping the physical ID to a logical ID, merely discloses a process that
29 provides an identifier (ID) and stores a database record of the association between
30 this ID and the object or other information used in decoding to identify the object.

1 Storing a database record of an association between an ID and an object is not the
2 same as mapping a physical ID to logical ID. There is only one ID used by Meyer,
3 whereas this claim recites two ID's--a physical ID and a logical ID. As such,
4 Meyer does not anticipate this claim.

5 Nonetheless, Applicant has amended this claim as indicated above.
6 Applicant respectfully submits that Meyer neither discloses nor suggests the
7 subject matter of this claim.

8 Accordingly, for at least these reasons this claim is allowable.

9 **Claims 2-7** depend from claim 1 and are allowable as depending from an
10 allowable base claim. These claims are also allowable for their own recited
11 features which, in combination with those recited in claim 1, are neither disclosed
12 nor suggested in the references cited and applied by the Office.

13 **Claim 8** has been amended and, as amended, recites a server comprising
14 [added language appears in bold italics]:

- 15 • one or more processors;
- 16 • one or more storage devices; and
- 17 • software code resident on the one or more storage devices which,
when executed by the one or more processors, cause the processors
to:
 - 18 ○ receive a physical ID that corresponds to a specific media
upon which content resides that can be experienced by a user;
 - 19 ○ map the physical ID to a logical ID;
 - 20 ○ search a database that contains metadata associated with the
specific media by using the logical ID as a basis for a search
query;
 - 21 ○ format the metadata in a XML schema; and
 - 22 ○ return the formatted metadata to a client, *wherein different
instances of a specific media with the same content thereon
are associated with different physical IDs that are mappable
to the same logical ID.*

In making out the rejection of this claim, the Office argues that Meyer anticipates its subject matter. Applicant disagrees. For example, as noted above, Meyer does not disclose mapping the ***physical ID to a logical ID***.

As such, Meyer does not anticipate this claim and this claim is allowable. Nonetheless, Applicant has amended this claim as indicated above. Meyer neither discloses nor suggests any such subject matter.

Claim 9 has been amended and, as amended, recites one or more computer-readable media having computer-readable instructions thereon which, when executed by a computer, cause the computer to [added language appears in bold italics]:

- receive a physical ID that corresponds to a specific media upon which content resides that can be experienced by a user;
- map the physical ID to a logical ID;
- search a database that contains metadata associated with the specific media by using the logical ID as a basis for a search query;
- format the metadata in a XML schema; and
- return the formatted metadata to a client, *wherein different instances of a specific media with the same content thereon are associated with different physical IDs that are mappable to the same logical ID*.

In making out the rejection of this claim, the Office argues that Meyer anticipates its subject matter. Applicant disagrees. For example, as noted above, Meyer does not disclose mapping the ***physical ID to a logical ID***.

As such, Meyer does not anticipate this claim and this claim is allowable. Nonetheless, Applicant has amended this claim. Meyer neither discloses nor suggests any such subject matter.

1 **Claim 10** has been amended and, as amended, recites a method of
2 processing media content comprising [added language appears in bold italics]:

- 3 • associating a physical ID with a logical ID, the physical ID
4 corresponding to a specific media associated with content that can be
5 experienced by a user;
- 6 • using the logical ID to query one or more databases that contain
7 metadata associated with the specific media; and
- 8 • returning metadata associated with the specific media to a client,
*wherein different instances of a specific media with the same
content thereon are associated with different physical IDs that are
mappable to the same logical ID.*

9

10 In making out the rejection of this claim, the Office argues that Meyer
11 anticipates its subject matter. Applicant disagrees. For example, as noted above,
12 Meyer does not disclose associating a ***physical ID with a logical ID***.

13 As such, Meyer does not anticipate this claim and this claim is allowable.
14 Nonetheless, Applicant has amended this claim as indicated above. Meyer neither
15 discloses nor suggests any such subject matter.

16 **Claims 11-18** depend from claim 10 and are allowable as depending from
17 an allowable base claim. These claims are also allowable for their own recited
18 features which, in combination with those recited in claim 10, are neither disclosed
19 nor suggested in the references cited and applied by the Office.

20 **Claim 19** has been amended and, as amended, recites a method of
21 processing media content comprising [added language appears in bold italics]:

- 22 • receiving a physical ID that corresponds to a specific media
23 associated with content that can be experienced by a user;
- 24 • attempting to map the physical ID to a logical ID;

- if a logical ID is found that corresponds to the physical ID, searching a database that contains metadata associated with the specific media by using the logical ID as a basis for a search query;
- if no logical ID is found that corresponds to the physical ID, attempting to establish a logical ID for the physical ID, *wherein different instances of a specific media with the same content thereon are associated with different physical IDs that are mappable to the same logical ID.*

In making out the rejection of this claim, the Office argues that Meyer anticipates its subject matter. Applicant disagrees. For example, as noted above, Meyer does not disclose attempting to map the *physical ID to a logical ID*.

As such, Meyer does not anticipate this claim and this claim is allowable. Nonetheless, Applicant has amended this claim as indicated above. Meyer neither discloses nor suggests any such subject matter.

Claims 20-26 depend from claim 19 and are allowable as depending from an allowable base claim. These claims are also allowable for their own recited features which, in combination with those recited in claim 19, are neither disclosed nor suggested in the references cited and applied by the Office.

Claim 27 has been amended and, as amended, recites a server computer comprising [added language appears in bold italics]:

- one or more processors;
- one or more storage devices; and
- software code resident on the one or more storage devices which, when executed by the one or more processors, cause the processors to:
 - receive a physical ID that corresponds to a specific media upon which content resides that can be experienced by a user;
 - attempt to map the physical ID to a logical ID;
 - if a logical ID is found that corresponds to the physical ID, search a database that contains metadata associated with the

- specific media by using the logical ID as a basis for a search query; and
- o if no logical ID is found that corresponds to the physical ID, attempt to establish a logical ID for the physical ID, *wherein different instances of a specific media with the same content thereon are associated with different physical IDs that are mappable to the same logical ID.*

In making out the rejection of this claim, the Office argues that Meyer anticipates its subject matter. Applicant disagrees. For example, as noted above, Meyer does not disclose attempting to map the *physical ID to a logical ID*.

As such, Meyer does not anticipate this claim and this claim is allowable. Nonetheless, Applicant has amended this claim as indicated above. Meyer neither discloses nor suggests any such subject matter.

Claim 28 depends from claim 27 and is allowable as depending from an allowable base claim. This claim is also allowable for its own recited features which, in combination with those recited in claim 27, are neither disclosed nor suggested in the references cited and applied by the Office.

Claim 39 has been amended and, as amended, recites a method of processing media content comprising [added language appears in bold italics]:

- receiving a physical ID that corresponds to a specific media upon which content resides that can be experienced by a user;
- attempting to map the physical ID to a logical ID, the logical ID serving as a basis for a search query of a database that contains metadata associated with the specific media;
- if no logical ID is found that corresponds to the physical ID, attempting to establish a logical ID for the physical ID by causing a Wizard user interface (UI) to be presented to a user via a client computer so that information pertaining to the user's specific media can be collected from the user, *wherein different instances of a specific media with the same content thereon are associated with different physical IDs that are mappable to the same logical ID.*

In making out the rejection of this claim, the Office argues that Meyer anticipates its subject matter. Applicant disagrees. For example, as noted above, Meyer does not disclose attempting to ***map the physical ID to a logical ID.***

As such, Meyer does not anticipate this claim and this claim is allowable. Nonetheless, Applicant has amended this claim as indicated above. Meyer neither discloses nor suggests any such subject matter.

Claims 40-46 depend from claim 39 and are allowable as depending from an allowable base claim. These claims are also allowable for their own recited features which, in combination with those recited in claim 39, are neither disclosed nor suggested in the references cited and applied by the Office.

Claim 47 has been amended and, as amended, recites one or more computer-readable media having computer-readable instructions thereon which, when executed by a computer, cause the computer to [added language appears in bold italics]:

- receive a physical ID that corresponds to a specific media upon which content resides that can be experienced by a user;
- attempt to map the physical ID to a logical ID, the logical ID serving as a basis for a search query of a database that contains metadata associated with the specific media;
- if no logical ID is found that corresponds to the physical ID, attempt to establish a logical ID for the physical ID by causing a Wizard user interface (UI) to be presented to a user via a client computer so that information pertaining to the user's specific media can be collected from the user, ***wherein different instances of a specific media with the same content thereon are associated with different physical IDs that are mappable to the same logical ID.***

1 In making out the rejection of this claim, the Office argues that Meyer
2 anticipates its subject matter. Applicant disagrees. For example, as noted above,
3 Meyer does not disclose attempting to ***map the physical ID to a logical ID.***

4 As such, Meyer does not anticipate this claim and this claim is allowable.
5 Nonetheless, Applicant has amended this claim as indicated above. Meyer neither
6 discloses nor suggests any such subject matter.

7 **Claim 48** has been amended and, as amended, recites a system for
8 providing metadata to clients comprising [added language appears in bold italics]:

- 9 • a server configured to receive physical IDs that correspond to a
10 specific media upon which content resides that can be experienced
11 by a user;
- 12 • one or more databases containing metadata associated with various
13 media; and
- 14 • at least one table containing physical IDs and associated logical IDs
15 to which the physical IDs are mapped, the logical IDs being
16 configured for use by the server in searching the one or more
databases for metadata associated with specific media, ***wherein
different instances of a specific media with the same content
thereon are associated with different physical IDs that are
mappable to the same logical ID.***

17 In making out the rejection of this claim, the Office argues that Meyer
18 anticipates its subject matter. Applicant disagrees. For example, as noted above,
19 Meyer does not disclose ***logical IDs to which the physical IDs are mapped.***

20 As such, Meyer does not anticipate this claim and this claim is allowable.
21 Nonetheless, Applicant has amended this claim as indicated above. Meyer neither
22 discloses nor suggests any such subject matter.

23 **Claims 49-50** depend from claim 48 and are allowable as depending from
24 an allowable base claim. These claims are also allowable for their own recited

1 features which, in combination with those recited in claim 48, are neither disclosed
2 nor suggested in the references cited and applied by the Office.

3 **Claim 56** has been amended and, as amended, recites a method of
4 processing media content comprising [added language appears in bold italics]:

- 5 • receiving a physical ID that corresponds to a specific CD upon
6 which content resides that can be experienced by a user;
- 7 • mapping the physical ID to a logical ID;
- 8 • searching a database that contains metadata associated with the CD
by using the logical ID as a basis for a search query;
- 9 • formatting the metadata in a XML schema; and
- 10 • returning the formatted metadata to a client, *wherein different
instances of a specific CD with the same content thereon are
associated with different physical IDs that are mappable to the
same logical ID.*

12
13 In making out the rejection of this claim, the Office argues that Meyer
14 anticipates its subject matter. Applicant disagrees. For example, as noted above,
15 Meyer does not disclose mapping the ***physical ID to a logical ID.***

16 As such, Meyer does not anticipate this claim and this claim is allowable.
17 Nonetheless, Applicant has amended this claim as indicated above. Meyer neither
18 discloses nor suggests any such subject matter.

19 **Claims 57-60** depend from claim 56 and are allowable as depending from
20 an allowable base claim. These claims are also allowable for their own recited
21 features which, in combination with those recited in claim 56, are neither disclosed
22 nor suggested in the references cited and applied by the Office.

23 **Claim 61** has been amended and, as amended, recites a method of
24 processing media content comprising [added language appears in bold italics]:
25

- receiving a physical ID that corresponds to a specific DVD upon which content resides that can be experienced by a user;
- mapping the physical ID to a logical ID;
- searching a database that contains metadata associated with the DVD by using the logical ID as a basis for a search query;
- formatting the metadata in a XML schema; and
- returning the formatted metadata to a client, *wherein different instances of a specific DVD with the same content thereon are associated with different physical IDs that are mappable to the same logical ID.*

In making out the rejection of this claim, the Office argues that Meyer anticipates its subject matter. Applicant disagrees. For example, as noted above, Meyer does not disclose mapping the ***physical ID to a logical ID.***

As such, Meyer does not anticipate this claim and this claim is allowable. Nonetheless, Applicant has amended this claim as indicated above. Meyer neither discloses nor suggests any such subject matter.

Claim 62 depends from claim 61 and is allowable as depending from an allowable base claim. This claim is also allowable for its own recited features which, in combination with those recited in claim 61, are neither disclosed nor suggested in the references cited and applied by the Office.

Claim 63 recites an XML schema comprising:

- a name tag associated with a CD name;
- an author tag associated with a CD author;
- a track tag associated with a CD track;
- at least one URL tag referencing a link to additional information pertaining to the CD; and
- the schema being configured for use in sending metadata associated with a CD to client computer for display for a user.

1 In making out the rejection of this claim, the Office argues that its subject
2 matter is anticipated by Meyer citing to paragraphs 015, 012, 014 and 027.
3 Applicant disagrees. Nowhere in any of these portions of Meyer is there any
4 disclosure of a specific XML schema as recited above.

5 The Office cites paragraph 15, lines 16-18 of Meyer as disclosing an XML
6 schema comprising a name tag associated with a CD name, and an author tag
7 associated with a CD author. This excerpt is reproduced below for the
8 convenience of the Office.

9
10 Record labels can link their music to information about the artist, the
label, electronic buying opportunities, etc.

11
12 This excerpt in no way discloses using XML schema. Furthermore, there is
13 no mention whatsoever of using any type of tag associated with a CD name or
14 author. As such Meyer does not anticipate this claim.

15 In addition, the Office cites paragraph 12, lines 1-5 as disclosing an XML
16 schema comprising a track tag associated with a CD track. This excerpt is
17 reproduced below for the convenience of the Office.

18
19 The following sections describe systems and processes for linking
audio and other media objects to metadata and actions via an identifier. For
20 the sake of illustration, the disclosure focuses on a specific media type,
namely audio signals.

21
22 This excerpt in no way discloses using XML schema. Furthermore, there is
23 no mention whatsoever of using any type of tag associated with a CD track. As
24 such Meyer does not anticipate this claim.

1 Additionally, the Office cites paragraph 14, lines 11-16 as disclosing an
2 XML schema comprising at least one URL tag referencing a link to additional
3 information pertaining to the CD. This excerpt is reproduced below for the
4 convenience of the Office.

5
6 In the case of an audio object, like a song, the metadata typically
7 includes the title, artist, lyrics, copyright owner, sound recording owner,
8 information about buying or sampling opportunities and URLs to this type
9 of data as well as web sites and other programs and devices.

10
11 This excerpt in no way discloses using XML schema. Furthermore, there is
12 no mention whatsoever of using any type of tag referencing a link to additional
13 information pertaining to the CD. As such Meyer does not anticipate this claim.

14
15 Finally, the Office cites paragraph 27, lines 11-19 as disclosing an XML
16 schema comprising the schema being configured for use in sending metadata
17 associated with a CD to client computer for display for a user. This excerpt is
18 reproduced below for the convenience of the Office.

19
20 The path of the identifier from the decoding process, and the return
21 path from a server to the communication application may include one or
22 more hops through a wire or wireless connection using standard wire and
23 wireless communication protocols like TCP/IP, HTTP, XML, WAP,
24 Bluetooth, etc. In addition, data returned to the user may be routed through
25 one or more servers that may forward the data, and in some cases, augment
the data or modify it in some fashion.

26
27 This excerpt in no way discloses using XML schema as specifically recited
28 in this claim. As such Meyer does not anticipate this claim.

1 In addition, in the advisory action, the Office argues that the prior art
2 discloses the user of markup languages for documentation and as a communication
3 protocol. Further, the Office argues that XML is a version of SGML and that
4 HTML is one way of defining and interpreting tags according to SGML rules.
5 Based on this, the Office concludes that HTML is a version of XML and since
6 Meyer discloses the capability to utilize HTML documentation, it therefore
7 discloses the use of XML and hence anticipates this claim.

8 The Office's argument is wholly wrong and completely misses the mark.
9 Without getting into the nuances of HTML and XML Applicant respectfully
10 submits that even if the Office's characterization and logic were true (which it is
11 not), Meyer still does not anticipate the specifically-recited subject matter of this
12 claim.

13 Accordingly, for at least these reasons, Meyer does not anticipate this claim
14 and it is allowable.

15 **Claims 64-65** depend from claim 63 and are allowable as depending from
16 an allowable base claim. These claims are also allowable for their own recited
17 features which, in combination with those recited in claim 63, are neither disclosed
18 nor suggested in the references cited and applied by the Office.

19 **Claim 66** recites an XML schema comprising:

20

21 • a title tag associated with a title of a movie embodied on a DVD; and
22 • at least one URL tag referencing a link to additional information
23 pertaining to the DVD.

24 In making out the rejection of this claim, the Office argues that its subject
25 matter is anticipated by Meyer citing to paragraphs 028 and 014. Applicant

1 disagrees. Nowhere in any of these portions of Meyer is there any disclosure of a
2 specific XML schema as recited above.

3 The Office cites paragraph 28, lines 12-16 of Meyer as disclosing an XML
4 schema comprising a title tag associated with a title of a movie embodied on a
5 DVD. This excerpt is reproduced below for the convenience of the Office.

6 In the latter case, the ripping process may extract metadata from the
7 CD, such as the table of contents, and use this metadata as a key to a
8 database (CDDB) to get information about the songs on the CD, such as
title, artists, etc.

9
10 This excerpt in no way discloses using an XML schema. Furthermore, there
11 is no mention whatsoever of using any type of tag associated with the title of a
12 movie. As such Meyer does not anticipate this claim.

13 Additionally, the Office cites paragraph 14, lines 11-16 as disclosing an
14 XML schema comprising at least one URL tag referencing a link to additional
15 information pertaining to the CD. This excerpt is reproduced below for the
16 convenience of the Office.

17
18 In the case of an audio object, like a song, the metadata typically
19 includes the title, artist, lyrics, copyright owner, sound recording owner,
information about buying or sampling opportunities and URLs to this type
of data as well as web sites and other programs and devices.

20
21 This excerpt in no way discloses using an XML schema. Furthermore, there
22 is no mention whatsoever of using any type of tag referencing a link to additional
23 information pertaining to the CD. As such Meyer does not anticipate this claim.

1 In addition, the Office makes the same argument in the advisory action as it
2 did for claim 63. For all of the reasons set forth above with regard to why the
3 Office's interpretation and logic is wrong, Meyer does not anticipate this claim.

4 Accordingly, for at least these reasons, Meyer does not anticipate this claim
5 and it is allowable.

6 **Claims 67-68** depend from claim 66 and are allowable as depending from
7 an allowable base claim. These claims are also allowable for their own recited
8 features which, in combination with those recited in claim 66, are neither disclosed
9 nor suggested in the references cited and applied by the Office.

10 **Claim 69** recites a method of processing media content comprising
11 [emphasis added]:

- 12 • generating a ***physical ID that corresponds to a specific media*** upon
13 which content resides that can be experienced by a user on a client
14 computer;
- 15 • sending the ***physical ID to a server configured to return metadata***
associated with the specific media;
- 16 • receiving, from the server, XML-formatted metadata;
- 17 • parsing, with the client computer, the XML-formatted metadata; and
- 18 • displaying the metadata for the user on the client computer.

19 In making out the rejection of this claim, the Office argues that Meyer
20 anticipates its subject matter. Applicant disagrees. Meyer does not appear to
21 anticipate this claim for at least the reason that it does not appear to receive ***XML-***
formatted metadata associated with specific media for which a physical ID was
22 sent. Accordingly, this claim is allowable.

23 **Claims 70-71** depend from claim 69 and are allowable as depending from
24 an allowable base claim. These claims are also allowable for their own recited
25

1 features which, in combination with those recited in claim 69, are neither disclosed
2 nor suggested in the references cited and applied by the Office.

3

4 **The Claims Rejected Over Jaeger**

5 **Claim 29** has been amended and, as amended recites a method of
6 processing media content comprising [added language appears in bold italics]:

- 7 • receiving a physical ID that corresponds to a specific media upon
8 which content resides that can be experienced by a user;
- 9 • attempting to map the physical ID to a logical ID by searching a first
table containing physical ID-to-logical ID mappings using a first
10 search;
- 11 • if the first search is unsuccessful, searching a second table
containing physical ID-to-logical ID mappings using a second
search; and
- 12 • if a logical ID is found that corresponds to the physical ID, searching
a database that contains metadata associated with the specific media
by using the logical ID as a basis for a search query, *wherein
different instances of a specific media with the same content
thereon are associated with different physical IDs that are
mappable to the same logical ID.*

16

17 In making out a rejection of this claim, the Office argues that Jaeger renders
18 obvious the subject matter of this claim. Applicant disagrees. For example, the
19 Office argues that Jaeger discloses receiving a physical ID that corresponds to a
20 *specific media* as recited in this claim, citing to column 4, lines 33-46 and column
21 4, lines 50-56. Applicant disagrees.

22 Jaeger describes a method and system that processes address data. Jaeger
23 instructs that the address data includes name, prename, title, street, zip code and
24 the like. This information in no way, shape or form is related to the subject matter
25 of this claim. The Office further argues that Jaeger's description of lists and data

1 records is equivalent to the description of the information contained in the physical
2 to logical IDS mapping table. This is simply not the case.

3 Assuming arguendo that Jaeger does disclose receiving a physical ID that
4 corresponds to a specific media (which it does not), the Office then argues that
5 Jaeger discloses searching a first table containing physical ID-to-logical ID
6 mappings using a *first search* and if the first search is unsuccessful, searching a
7 second table containing physical ID-to-logical ID mappings using a *second search*
8 (citing to Jaeger col. 4, lines 33-46, and column 4, lines 50-56). The Applicant
9 respectively disagrees.

10 The excerpt cited by the Office in no way discloses searching a table
11 containing physical ID-to-logical ID mappings. In fact, the excerpt does not
12 mention any type of search whatsoever. The recited subject matter recites a first
13 search of a first table, and a second search of a second table. (To see the benefit of
14 searching 2 tables see figure 6 of the Applicant's disclosure, and the related
15 discussion on pages 15-18). Jaeger recites no such subject matter.

16 Jaeger is not even remotely germane to the subject matter recited in this
17 claim. The Office has failed to establish a *prima facie* case of obviousness for a
18 number of different reasons not the least of which is the failure of Jaeger to even
19 remotely suggest the subject matter of this claim. In addition, the Office's stated
20 motivation in making out this rejection does not make sense.

21 Nonetheless, Applicant has amended this claim as indicated above. Jaeger
22 neither discloses nor suggests the subject matter of this claim.

23 Accordingly, this claim is allowable.

24 **Claims 30-34** depend from claim 29 and are allowable as depending from
25 an allowable base claim. These claims are also allowable for their own recited

1 features which, in combination with those recited in claim 29, are neither disclosed
2 nor suggested in the references cited and applied by the Office.

3 **Claim 35** has been amended and, as amended, recites one or more
4 computer-readable media having computer-readable instructions thereon which,
5 when executed by a computer, cause the computer to [added language appears in
6 bold italics]:

- 7 • receive a physical ID that corresponds to a specific media upon
8 which content resides that can be experienced by a user;
- 9 • attempt to map the physical ID to a logical ID by searching a first
10 table containing physical ID-to-logical ID mappings using a first
11 search, the first search comprising a low cost search;
- 12 • if the first search is unsuccessful, search a second table containing
13 physical ID-to-logical ID mappings using a second search;
- 14 • if the second search is unsuccessful, search the first table using a
15 third search, the third search comprising a higher cost search than
16 the first search; and
- 17 • if a logical ID is found that corresponds to the physical ID, search a
18 database that contains metadata associated with the specific media
19 by using the logical ID as a basis for a search query, *wherein
20 different instances of a specific media with the same content
21 thereon are associated with different physical IDs that are
22 mappable to the same logical ID.*

23 In making out a rejection of this claim, the Office argues that Jaeger renders
24 obvious the subject matter of this claim. Applicant disagrees. Jaeger does not
25 disclose receiving a physical ID that corresponds to a specific media as recited in
this claim. Additionally, Jaeger does not disclose searching a first table, and if the
first search is unsuccessful, searching a second table using a second search, and if
the second search is unsuccessful, searching the first table using a third search, the
third search comprising a higher cost search than the first search.

1 Nonetheless, Applicant has amended this claim as indicated above. Jaeger
2 neither discloses nor suggests the subject matter of this claim.

3 For the same reasons as discussed in claim 29, this claim is allowable.

4 **Claim 36** has been amended and, as amended, recites a method of
5 processing media content comprising [added language appears in bold italics]:

- 6 • providing a canonical table containing physical ID to logical ID
7 mappings, the physical IDs being associated with specific media
8 containing content that can be experienced by a user, the logical IDs
9 being configured for use in database queries to locate metadata
10 associated with specific media;
- 11 • providing a table containing user-provided physical ID to logical ID
12 mappings;
- 13 • receiving a physical ID associated with a specific media;
- 14 • conducting a first low cost search of the canonical table to determine
15 whether there is a matching physical ID with a corresponding logical
16 ID;
- 17 • if the first low cost search is unsuccessful, conducting a second low
18 cost search of the table containing the user-provided physical ID to
19 logical ID mappings to determine whether there is a matching
20 physical ID with a corresponding logical ID;
- 21 • if the second low cost search is unsuccessful, conducting a third
22 higher cost search of the canonical table to determine whether there
23 is a matching physical ID with a corresponding logical ID; and
- 24 • if any of the searches are successful, using the corresponding logical
25 ID to search a database containing metadata associated with the
 specific media, *wherein different instances of a specific media with
 the same content thereon are associated with different physical IDs
 that are mappable to the same logical ID.*

21 In making out a rejection of this claim, the Office argues that Jaeger renders
22 obvious the subject matter of this claim. Applicant disagrees. Jaeger does not
23 disclose receiving a physical ID that corresponds to a specific media as recited in
24 this claim. Additionally, Jaeger does not disclose conducting a first low cost

1 search of the canonical table, and if the first search is unsuccessful, conducting a
2 second low cost search of the table containing the user-provided physical ID to
3 logical ID mappings, and if the second search is unsuccessful, conducting a third
4 higher cost search of the canonical table.

5 Nonetheless, this claim has been amended as indicated above. Jaeger
6 neither discloses nor suggests the subject matter of this claim.

7 Accordingly, this claim is allowable.

8 **Claims 37-38** depend from claim 36 and are allowable as depending from
9 an allowable base claim. These claims are also allowable for their own recited
10 features which, in combination with those recited in claim 36, are neither disclosed
11 nor suggested in the references cited and applied by the Office.

12 **Claim 51** has been amended and, as amended, recites a system for
13 providing metadata to clients comprising [added language appears in bold italics]:

14

- 15 • a canonical table comprising multiple physical IDs associated with
specific media containing content that can be experienced by a user;
- 16 • multiple logical IDs associated with the multiple physical IDs;
- 17 • individual physical IDs being mapped to individual logical IDs; and
- 18 • the logical IDs being configured for use in database queries to locate
metadata associated with specific media, *wherein different
instances of a specific media with the same content thereon are
associated with different physical IDs that are mappable to the
same logical ID.*

19

20

21 In making out a rejection of this claim, the Office argues that Jaeger renders
22 obvious the subject matter of this claim. Applicant disagrees. For example, the
23 Office argues that Jaeger discloses receiving a physical ID that corresponds to a
24

1 ***specific media*** as recited in this claim, citing to column 4, lines 33-46 and column
2 4, lines 50-56. Applicant disagrees.

3 Jaeger describes a method and system that processes address data. Jaeger
4 instructs that the address data includes name, prename, title, street, zip code and
5 the like. This information in no way, shape or form is related to the subject matter
6 of this claim.

7 Jaeger is not even remotely germane to the subject matter recited in this
8 claim. The Office has failed to establish a *prima facie* case of obviousness for a
9 number of different reasons not the least of which is the failure of Jaeger to even
10 remotely suggest the subject matter of this claim. In addition, the Office's stated
11 motivation in making out this rejection does not make sense.

12 Nonetheless, Applicant has amended this claim as indicated above. Jaeger
13 neither discloses nor suggests the subject matter of this claim.

14 Accordingly, this claim is allowable.

15 **Claims 52-55** depend from claim 51 and are allowable as depending from
16 an allowable base claim. These claims are also allowable for their own recited
17 features which, in combination with those recited in claim 51, are neither disclosed
18 nor suggested in the references cited and applied by the Office.

19

20 **The Claims Rejected Over Milsted**

21 **Claim 72** recites a method of providing metadata to a client comprising
22 [emphasis added]:

23

24 • establishing a table that contains *user-provided entries that map*
25 *physical IDs to logical IDs, the physical IDs corresponding to*
 specific media upon which content resides that can be experienced

1 by various users, the logical IDs being configured for use in
2 querying one or more databases that contain metadata associated
3 with the specific media, the metadata being returnable to a client;
4

- statistically evaluating the entries to determine, for each physical ID,
a most likely logical ID match; and
- making the most likely logical ID match available so that it can be
used to query the one or more databases.

5

6 In making out the rejection of this claim, the Office argues that its subject
7 matter is rendered obvious in view of Milsted, citing to column 6, lines 34-38,
8 column 6, lines 42-47 and column 47, lines 47-53. Applicant disagrees. These
9 excerpts are reproduced below for the convenience of the Office.

10 **Column 6, Lines 34-48**

11 It is an object of the present invention to remove the above-
12 mentioned drawbacks and to provide a system for tracking usage of content
13 data. One embodiment of the present invention provides a system for
tracking usage of digital content on user devices.

14 This excerpt in no way discloses establishing a table that contains user-
15 provided entries that map *physical IDs to logical IDs*, the physical IDs
16 corresponding to *specific media*.

17 **Column 6, Lines 42-47**

18 Additionally, a logging site that is coupled to the network tracks the
19 playing of the content data. In particular, the logging site receives play
20 information from the network, and the play information includes the
21 number of times that the content data has been played by the associated
content player.

22 This excerpt in no way discloses establishing a table that contains user-
23 provided entries that map *physical IDs to logical IDs*, the physical IDs
24 corresponding to *specific media*.

25 **Column 47, Lines 47-53**

1 The Clearinghouse(s) 105 maintains a Audit Logs 150 of
2 information for each operation that is performed during Content 113
3 purchase transactions and report request transactions. The information can
4 be used for a variety of purposes such as audits of the Secure Digital
5 Content Electronic Distribution System 100, generation of reports, and data
6 mining.
7

8 This excerpt in no way discloses establishing a table that contains user-
9 provided entries that map *physical IDs to logical IDs*, the physical IDs
10 corresponding to *specific media*.
11

12 These excerpts do not mention user-provided entries that map physical IDs
13 to logical IDs, the physical IDs corresponding to specific media. Quite frankly,
14 Applicant does not understand how these cited excerpts are even remotely
15 germane to the recited subject matter of this claim. Accordingly, for a number of
16 reasons, the Office has failed to establish a *prima facie* case of obviousness.
17

18 **Claim 73** depends from claim 72 and is allowable as depending from an
19 allowable base claim. This claim is also allowable for its own recited features
20 which, in combination with those recited in claim 72, are neither disclosed nor
21 suggested in the references cited and applied by the Office.
22

23 **Claim 74** recites a method of providing metadata to a client comprising
24 [emphasis added]:
25

- 26 • *providing a table containing user-provided entries that map*
27 *physical IDs to logical IDs, the physical IDs corresponding to*
28 *specific media* upon which content resides that can be experienced
29 by various users, the logical IDs being configured for use in
30 querying one or more databases that contain metadata associated
31 with the specific media, the metadata being returnable to a client;
- 32 • computing, from the table, a list of physical IDs that are to be
33 statistically evaluated;
- 34 • for each listed physical ID, ascertaining the logical IDs that have
35 been associated with it by users;

- 1 • computing a distribution of logical IDs for a given physical ID, the
2 distribution describing, for each logical ID, the number of times the
3 physical ID has been mapped thereto;
- 4 • adding to the distribution, an entry that corresponds to a current
5 trusted logical ID mapping;
- 6 • weighting the added entry; and
- 7 • computing, from the distribution, a most likely physical ID to logical
8 ID match.

9
10 In making out the rejection of this claim, the Office argues that its subject
11 matter is rendered obvious in view of Milsted, citing to, among other portions,
12 column 6, lines 34-38, column 6, lines 42-47 and column 47, lines 47-53.
13 Applicant disagrees.

14 These excerpts do not mention user-provided entries that map physical IDs
15 to logical IDs, the physical IDs corresponding to specific media. Quite frankly,
16 Applicant does not understand how these cited excerpts are even remotely
17 germane to the recited subject matter of this claim. Accordingly, for a number of
18 reasons, the Office has failed to establish a *prima facie* case of obviousness.

19 **Claims 75 and 76** depend from claim 74 and are allowable as depending
20 from an allowable base claim. These claims are also allowable for their own
21 recited features which, in combination with those recited in claim 74, are neither
22 disclosed nor suggested in the references cited and applied by the Office.

23
24 **Conclusion**

25 All of the claims are in condition for allowance. Accordingly, Applicant
26 requests a Notice of Allowability be issued forthwith. If the Office's next
27 anticipated action is to be anything other than issuance of a Notice of Allowability,
28

Applicant respectfully requests a telephone call for the purpose of discussing an appeal.

Respectfully Submitted,

Dated: 11/21/05

By:

Lance R. Sadier
Reg. No. 38,605
(509) 324-9256